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9 Attorney for Defendant  
10 LANCE M. LAURENDINE

11  
12 IN THE UNITED STATES DISTRICT COURT  
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA, ) NO. 1:05-CR-00045 OWW  
15 Plaintiff, ) STIPULATION RE: PROTECTIVE ORDER  
16 v. ) AND ORDER  
17 LANCE M. LAURENDINE, ) Judge: Hon. Oliver W. Wanger  
18 Defendant. )  
19 \_\_\_\_\_ )  
20

21 IT IS HEREBY STIPULATED by and between the parties hereto through their respective  
22 counsel that digital discovery, including but not limited to two hard drives, shall be provided to defense  
23 expert Dave Townsend, by the F.B.I. for examination pursuant to terms in the Protective Order as set  
24 forth herein.

25 DATED: August 31, 2005

DATED: August 31, 2005

26 McGREGOR W. SCOTT  
United States Attorney

QUIN DENVER  
Federal Public Defender

27 /s/ David L. Gappa  
DAVID L. GAPPY  
Assistant United States Attorney  
Attorney for Plaintiff

/s/ Ann H. Voris  
ANN H. VORIS  
Assistant Federal Defender  
Attorney for Defendant

## ORDER

**IT IS HEREBY ORDERED:**

Any digital discovery provided by the government under its discovery obligation, shall not be reproduced by any party. This includes reproducing the discovery in digital form.

No party shall transfer any of the digital discovery to any source including other computers or digital storage devices, except to the extent necessary to conduct a forensic analysis of the defendant's computer, hard drive(s), operating system, and related storage media.

The digital discovery shall not be transmitted in any manner, including via the United States Mail or the internet.

All parties shall take all steps necessary to prevent the public dissemination of the digital discovery provided in this case.

This order allows the defense expert to access the electronic discovery only for the purpose of determining whether the defendant has a viable defense that his computer was “hacked,” i.e., that someone other than the defendant is responsible for placing images of child pornography on the defendant’s computer, computer hard drive(s), and/or related storage media.

The defense expert shall not knowingly access, copy or otherwise duplicate any material within the discovery that is or may fall within the attorney-client privilege. Further, if a defense expert accesses such material, he shall not discuss or disclose that material with anyone else, including the defendant and the attorney for the defendant.

Defense counsel and his representative, including any designated expert, shall return all digital discovery to the government at the conclusion of the assessment of the defendant's defense. This will be without prejudice to seek an additional protective order should the defendant decide to proceed to trial and need expert assistance in preparation of his defense.

**SO ORDERED.**

Dated: September 7, 2005

/s/Oliver W. Wanger  
OLIVER W. WANGER, Judge  
United States District Court  
Eastern District of California